

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

UNITED STATES OF AMERICA

v.

WILLIAM COMBS

Defendant.

Case No. 3:23-mj-00072

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Michael W. Wells, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION

1. This affidavit is submitted in support of a criminal complaint and arrest warrant charging WILLIAM COMBS (“COMBS” or “DEFENDANT”) with one count of possession of explicit material involving a minor, in violation of 18 U.S.C. § 2252(a)(4)(B), and occurring on or about August 10, 2023 in the Western District of Virginia.

II. AGENT BACKGROUND

2. I am a Task Force Officer (TFO) with the United States Department of Homeland Security - Homeland Security Investigations (“HSI”) assigned to Harrisonburg, Virginia.¹ I have been a Task Force Officer with HSI since October 2021. I am currently assigned to the Child

¹ I am an “investigative or law enforcement officer of the United States” within the meaning of 18 U.S.C. § 2510(7). That is, I am an officer of the United States, empowered by law to conduct investigations regarding violations of United States law, to execute warrants issued under the authority of the United States, and to make arrests of the offenses enumerated in, among others, 18 U.S.C. §§ 2251 *et seq.*

Exploitation Group and the Internet Crimes Against Children (“ICAC”) Task Force. In this role I conduct a wide variety of investigations of crimes involving sexual exploitation of children, including federal and Virginia state crimes that involve computers and the internet. The crimes that I investigate include violations involving the possession, production, and distribution of child sexual abuse material (“CSAM”).

3. In addition to working on federal investigations, I have worked on child molestation/child sex abuse cases while employed as a duly sworn Police Detective for the Albemarle County Police Department in Charlottesville, Virginia. I have been a sworn officer in Central Virginia since November 1994, and served the last 17 years in the Criminal Investigations Division. In connection with my work in both local and federal law enforcement, I have led and received formal training on the investigation of cases involving the sexual exploitation of children. This includes training programs on the execution of search warrants involving CSAM and seizures of computers and other digital storage media involving CSAM. In addition, I have conducted numerous investigations resulting in the seizure of contraband and the arrest of numerous suspects.

4. Through my work, I have become familiar with the methods used by individuals engaging in collecting, distributing, and producing CSAM, as well the types of evidence gleaned from executing search warrants on digital devices and social media accounts. I have also become familiar with the methods child sex predators use to groom or otherwise target minors in-person and online for criminal purposes.

III. SOURCES OF INFORMATION

5. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement officers, as well as other investigative sources, which I believe are reliable. This affidavit is intended to show merely that

there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter. Further, my understanding of the facts and circumstances described herein may change or evolve as new information is discovered or learned during the investigation.

IV. STATUTORY AUTHORITY

6. 18 U.S.C. § 2252(a)(4)(B) prohibits a person from knowingly possessing, or knowingly accessing with intent to view, one or more books, magazines, periodicals, films, or other materials which contain visual depictions of minors engaged in sexually explicit conduct that have been mailed, shipped, or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or which was produced using materials which have been mailed, shipped or transported, by any means including by computer.

V. PROBABLE CAUSE

A. Identification of COMBS Through UC Activity in a Chat Room

7. On July 26, 2023, a special agent with Homeland Security Investigations (HSI) in North Carolina contacted the Albemarle County Police Department (ACPD) in reference to the identification of a target ACPD's territory. The target (later identified as COMBS) was encountered during an undercover operation on Grindr² spearheaded by the Greater Piedmont-Triad Area ICAC.

8. As part of ICAC's operation, an undercover investigator ("UC") created a fictitious Grindr account with a profile stating the user was the father of a 12-year-old boy was interested in certain explicit sexual proclivities. The UC was contacted via a direct message on Grindr by a user

² According to its website, Grindr is an online social networking and dating application geared towards the LGBTQ community.

who stated that he and the user had a lot in common and requested to communicate further on an encrypted communication application (Telegram). The UC agreed to communicate further, but asked to use a different encrypted communication application, Discord. The user obliged.

9. Through Discord, the user sent messages via his account profile name “darthjj.” “Darthjj” asked for photographs of the UC’s purported 12-year-old son and said he was sexually attracted to his 12-year-old nephew and his niece.³ “Darthjj” arranged to meet the UC’s purported 12-year-old son to engage in sexual contact with the minor.

10. I have reviewed the communications exchanged on Discord between darthjj and the UC. Below are select statements from the exchange between Discord user darthJJ and the UC on or about June 28, 2023:

darthJJ: I rly wanna suck off my nephew

UC: Or acting as a government agent?

darthJJ: No I'm not

UC: Okay cool

That's cool about you and your nephew

darthJJ: Yeah, I wish I could. He’s 12 and very sexy

UC: I'm thinking about something similar with my 12 year old son

Haven’t played with him yet but was wondering if there’d be someone out there for him to gain experience with

darthJJ: I’d be happy to suck him

UC: Cool

darthJJ: He’s a virgin?

³ Darthjj did not disclose the age of his niece, but I later learned that she is a minor through this investigation. Based on my training and experience, it was concerning from a safety perspective that COMBS identified real minor relatives in discussing his sexual attraction.

11. Based on my training and experience, I know that the term “playing” (as used above by the UC) is an often-used coded reference to engaging in exploitative behavior with a minor and/or groom the minor to make him/her more susceptible to such conduct. When the UC used this term, “darthjj” appeared to understand the reference by then offering to engage in oral sex with the UC’s purported minor son.

12. Later in the exchange, “darthjj” stated that he planned to drive to meet the UC on Friday, June 30, 2023 for the purpose of performing sexual acts on, and in front of, the UC’s purported 12-year-old boy. “Darthjj” subsequently attempted to reschedule the appointment and then blocked communication with the UC’s Discord account.

B. Identification of COMB’s Residence and Related Search Warrant

13. Law enforcement subsequently obtained the IP address associated with Discord user darthjj, and the subscriber information that was associated with the same IP address. The subscriber for the IP address that was used by Discord user- “darthjj” was William COMBS (“COMBS”). Law enforcement compared the subscriber’s address in Charlottesville, Virginia with Albemarle County Property Tax records. Both the subscriber data and tax records listed William COMBS as the user/owner.

14. On or about July 28, 2023, law enforcement obtained a state search warrant for the above-referenced property owned by COMBS.

15. On or about August 8, 2023, I obtained a state arrest warrant for COMBS for violation of VA Code 18-2-374.3(B) (online sexual solicitation of a minor for sexual acts).

16. On or about August 10, 2023, law enforcement executed the search and arrest warrants. Several items of evidence were seized and taken to the Albemarle County Police Department (“ACPD”) as evidence, including several computer devices.

C. COMBS’ Post-Miranda Statements

17. Following his state arrest and advisement of *Miranda* rights, COMBS agreed to be interviewed by law enforcement. COMBS made several statements against his own interests. As an example, COMBS admitted he was Discord user “darthjj” and he engaged in the chat exchange described above. COMBS also provided several passcodes for the seized devices and acknowledged the devices contained CSAM.

D. Forensic Examination of Seized Digital Devices

18. On or about August 10, 2023, a forensic examiner began reviewing the electronic devices seized from COMBS’ residence. Through the initial analysis, law enforcement identified more than 2,000 files containing CSAM. One of the devices showed a CSAM cover photo on its screen. A more complete examination of the seized digital evidence remains ongoing. At the time of this writing, law enforcement has identified more than 3,500 files depicting minors engaged in sexually explicit acts.

19. I personally reviewed many of these files and, based on my training and experience, found that many files depict minors engaged in sexual acts and qualify as CSAM in violation of 18 U.S.C. § 2252(a)(4)(B).

20. For example, one file title contained the terms “4yo” and “deepthroat” [sic]. The content consists of a 15 second video with audio of an adult male straddling a small female child that appears to be approximately three to four years old and forcing his penis into her mouth. Based on my training, experience, and participation in this investigation, I believe “4yo” is a reference to

the potential age of the CSAM victim in this video. I know that individuals who collect, receive, and distribute CSAM often organize their material by referencing the content of the image or video in the file name.

VI. CONCLUSION


21. Based on the foregoing facts, along with my training and experience, I believe there is sufficient probable cause to believe that William Dwayne COMBS has committed the following offenses: possession of child pornography, in violation of 18 U.S.C. § 2252(a)(4)(B), on or about August 10, 2023.

Respectfully submitted,

s/ Michael W. Wells

MICHAEL W. WELLS
Task Force Officer
Homeland Security Investigations

Sworn to before me over the telephone pursuant to
Fed. R. Crim P. 4.1 and 4(d) and signed by me
on this 27th day of November, 2023.



JOEL C HOPPE
United States Magistrate Judge